

ELLIS: LAWHORNE

John F. Beach
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March 23, 2007

FILED ELECTRONICALLY AND ORIGINAL VIA HAND DELIVERY

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Synergy Business Park, Saluda Building
101 Executive Center Dr., Suite 100
Columbia, South Carolina 29210

RE: Petition of the Office of Regulatory Staff
Docket No. 2006-327-WS, ELS File No. 1015-10306

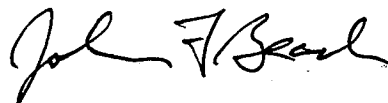
Dear Mr. Terreni:

Enclosed for filing please find the original and one copy (1) copy of the **Motion To Be Relieved As Counsel** for filing in the above-referenced docket. By copy of this letter, I am serving all parties of record in this proceeding and enclose my certificate of service to that effect.

Please stamp "received" the additional copy of this letter, and return via the bearer of same.

With kind regards, I am

Yours truly,



John F. Beach

JB/tm
Attachment

cc: Randall Dong, Esquire, w/a
all parties of record, w/a
Mr. Mark Wrigley, w/a

THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

IN RE:
Office of Regulatory Staff,
Petitioner

Wyboo Plantation Utilities, Inc. ,
Respondent.

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) **MOTION TO BE RELIEVED AS COUNSEL**
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)

a lawyer may withdraw from representing a client if: . . . (5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services or payment therefore and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled:

WPU is indebted to Ellis Lawhorne in excess of \$130,000 in legal fees and costs, almost all of which was incurred during Ellis Lawhorne's representation of WPU in WPU's request for rate relief, Commission Docket No. 2005-13-WS.

Counsel has given reasonable warning to WPU that it will withdraw unless the obligation is fulfilled, and WPU has failed to fulfill the obligation in response to that warning.

Counsel is therefore informed and believes that it is entitled to an order immediately relieving Ellis Lawhorne as counsel for WPU.

Upon grant of this motion, all pleadings and correspondence in this docket should be directed to WPU at the address below:

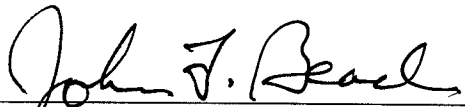
Wyboo Plantation Utilities, Inc.
Mark S. Wrigley
President
PO Box 2099
Sumter SC 29151
(843) 774-2010

WHEREFORE, for the reasons set for above, John Beach and Ellis Lawhorne move this honorable Commission for an Order:

- a) Relieving John Beach and Ellis Lawhorne as counsel for WPU in this proceeding;
- b) Notifying the parties that WPU should be served at the address set forth above; and
- c) For such other relief as is just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.



John F. Beach, Esquire
1501 Main Street, 5th Floor
P.O. Box 2285
Columbia, South Carolina 29202
Telephone: (803) 779-0066
Facsimile: (803) 799-8479

Columbia, South Carolina
March 23, 2007


IN RE:

V.

CERTIFICATE OF SERVICE

Wendy Cartledge, Esquire
C. Lessie Hammonds
Office of Regulatory Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

na SC 29211


Trina Mackie, Paralegal

March 23, 2007
Columbia, South Carolina